

Common Mistakes in HACCP



Cooked Crab

Disclaimer: This information supplements HACCP training, which is available through the Marine Advisory Program at <http://www.uaf.edu/map/haccp.html>. Regulations are occasionally changed and subject to interpretation by consumers and agencies.

#1 Too many critical control points

Your hazard analysis must identify the pathogen hazard specifically for *Listeria* at the cook step and the HACCP plan should include a critical control point for this process-related hazard. You may identify additional process hazards in your hazard analysis that need to be controlled and included in the HACCP plan, but you must include the *Listeria* hazard.

#2 Using additives without listing them

Your regulatory inspector should not find any substances that you use in processing in your plant, without also seeing them listed in your hazard analysis. This includes defoaming agents, color fixatives, glaze additives, and anything that will touch your product. If you use any additives you should have documentation in your paperwork that the substance is “generally recognized as safe” (GRAS) by the FDA or proven to not be an allergen and is legal to use, or that the product is for export only and complies with section 801(e) of the Food Drug and Cosmetic Act.

#3 Not having an alternative process

The HACCP regulation does not require you to plan an alternative process ahead of time in case of process deviation, but you would be wise to have a written procedure available so your employees are clear about the process. Many crab processors simply recook any baskets that might have been taken out early. This does not help the quality of the crab but it is a better alternative than possibly growing pathogens.

#4 Not calibrating equipment

You must ensure that you have achieved your cook requirements at your critical control point to control *Listeria* at the cook step. You will need to verify that your thermometer is reading correctly, as well as your timer if you are using one in your critical control point. It is up to you how often you calibrate your equipment but you will have to convince your regulatory inspector that the frequency of calibration is reasonable to assure accuracy of your equipment. One technique is to contact the manufacturer of the equipment for their advice on frequency of calibration.

#5 Not having a reference for the validity of your cook step

You need some sort of documentation from a processing authority describing what temperature is necessary to kill all *Listeria* in your product. Process authority can be regulatory guidelines, experimental studies, scientific publications, or known experts.



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ASG-40 2004